

RECEIVED

MAR 02 2018

IN THE UNITED STATES DISTRICT COURT

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC

FOR THE EASTERN DISTRICT OF NORTH CAROLINA

5:18-CV-89-FL DIVISION

Carter, Danielle, A.)

_____)

_____)

(Enter above the full name
of the Plaintiff[s] in this
action).

vs.

Case No. _____
(To be assigned
by the Clerk of
District Court)

Thiam, Astor, owner)

African Hair Braiding Gallery)

_____)

_____)

(Enter above the full name of
ALL Defendant[s] in this action.
Fed.R.Civ.P.10(a) requires that
the caption of the complaint
include the names of all the
parties. Merely listing one
party and "et al." is insufficient.
Please attach additional sheets if
necessary).

COMPLAINT

1. Plaintiff resides at Naleigh, NC

2. Defendant(s) name(s): Thiam, Astou; African Hair
Braiding Gallery

Location of principal office(s) of the named defendant(s):
3031 Capital Blvd., #103, Raleigh, NC, 27604

Nature of defendant(s) business: Salon

Approximate number of individuals employed by defendant:
8-50

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) X Failure to employ me.
- (B) X Termination of my employment.
- (C) X Failure to promote me.
- (D) X Other acts as specified below:

The defendant failed to fairly compensate, provide minimum wages, and also provide appropriate applications for income taxes. The defendant assigned several duties pertinent to a full-time position, however, did not offer equal opportunity. The defendant does harass my marital status.

5. Plaintiff is:

(A) _____ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were 10/2010-9/2017.

Employment was terminated because:

(1) ☒ plaintiff was discharged.

(2) _____ plaintiff was laid off.

(3) _____ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) ☒ my race.

(B) ☒ my religion.

(C) _____ my sex.

(D) X my national origin.

(E) X other as specified below:

The defendant discriminated against perceived
disabilities

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Iniam, ASTOU; African; Female; owner

8. The alleged discrimination occurred on or about _____

October 2016 to September 2017

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

The individual named above has used my image
and photograph to promote and sell services without
proper release, consent, agreement, and/or compensation.
The individual (Iniam) repeatedly requested that I work,

even with my legitimate licenses, however, stated that I am an American, that Americans cannot have official position within the business, that my race does not compare to being African, that I'd have to be muslim to continue to associate with the business; also that I'm "daughter", "Sistah", and "have to pray". The defendant has imposed slavery. The defendant has exploited, even perceived disability, to initiate franchise. The defendant stalks.

10. The alleged illegal activity took place at: 3081
Capital Blvd. #103, Raleigh, NC, 27604

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about 05 January 2018. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 1-15-18.

12. I seek the following relief:

- (A) _____ recovery of back pay;
 - (B) _____ reinstatement to my former job;
 - (C) X trial by jury on all issues so triable;
- and any other relief as may be appropriate, including

injunctive orders, damages, costs and attorney's fees.

03-02-2018
Date

William A. Cooper
Signature of Plaintiff
P.O. BOX 40194
Raleigh, NC, 27604

(252) 762-3310
Address and Phone Number of Plaintiff